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December 20, 2005

Mr. Brian Amme
Vegetation EIS Project Manager, BLM
P.O. Box 12000
Reno, Nevada 89520-0006

RE: BLM Draft Vegetation Treatments Using Herbicides Programmatic EIS

Dear Mr. Amme;

- 1 Grand County is writing in support of the BLM EIS preferred Alternative B: To expand herbicide use and allow for use of new herbicides in 17 western states and we support the developed "Protocol for Identifying, Evaluating and Using Herbicides" to facilitate the evaluation and addition of new chemicals as they become available in the future.
- 2 Grand County strongly opposes all the other alternatives listed:
 - Alternative A: No change from current EIS
 - Alternative C: No use of herbicides
 - Alternative D: Alternative B without aerial application of herbicides
 - Alternative E: No use of present or future AHAS inhibitor herbicide
- 3 The EPA currently has a stringent and effective protocol for the registration of herbicides in accordance with the FIFRA registration process. The use of herbicides in noxious weed control is a vital component to an integrated weed management program and it would be extremely harmful to public lands if the BLM were limited or restricted from using herbicides. Grand County has been successfully collaborating with the BLM for the past decade in an effort to control and reduce the presence of noxious weeds in grazing allotments, recreation sites, rangeland and critical wildlife habitat and fisheries. Alternative B would enable the continued success of noxious weed control on BLM lands in Grand County.

Sincerely,

James Newberry, Chairman
Grand County Board of County Commissioners